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Attorney for Claimants

Sara Jacobson, Clifford Jacobson,

Benjamin Jacobson, and Anna Jacobson

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re

PG&E Corporation,

and

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric Company

☒ Affects both Debtors

*All paper shall be filed in the Lead Case, No.
19-30088-DM

Case No. 19-30088-DM

Chapter 11

Lead Case, Jointly Administered

**DECLARATION OF MOVANT SARA
JACOBSON IN SUPPORT OF MOTION
PURSUANT TO FED. R. BANKR. PROC.
7015 AND 7017 TO ENLARGE TIME TO
FILE PROOF OF CLAIM PURSUANT TO FED.
R. BANKR. PROC. 9006(b)(1)**

Date: February 9, 2021

Time: 10:00 a.m. (Pacific Time)

Place: Telephonic/Video Appearances Only

United States Bankruptcy Court

Courtroom 17,

450 Golden Gate Ave., 16th Floor

San Francisco, CA

Judge: Hon. Dennis Montali

Objection Deadline: February 2, 2021

1 I, Sara Jacobson, hereby declare:

2 1. I am the movant in this matter and I suffered losses and damages in Paradise, CA as
3 a result of the Camp Fire in 2018.

4 2. My filing for PGE Proof of Claim for the Camp Fire of November 8, 2018, was
5 delayed due to several circumstances.

6 3. At the time of the fire my two children, Benjamin and Anna, and I were with my
7 father, Ralph Hein, at his property with my mother. My father and mother's home was under very
8 serious threat at the time of being consumed by the fire and my mother was actually suffering from
9 cancer at the time. I helped my father to evacuate and we all fled Paradise that day. We were all
10 lucky to evacuate safely.

11 4. My mother, Linda Hein, was at Windsor Care Center Skilled Nursing, Chico, CA
12 recovering from Cancer Surgery at the time of the fire. I was assisting my father cope with the
13 terrifically painful effects of my mother's illness at the time. I too was struggling to cope with all
14 that our family was suffering.

15 5. These are my reasons for delay in filing the PG&E Camp Fire Claim on time. Thank
16 you for considering my late Proof of Claim.

17 6. All statements in this declaration are based on my own personal knowledge and
18 observation and from my review of the court and business records in this case, or upon information
19 and belief as indicated. If called to testify on this matter, I can and would competently testify to the
20 matters set forth in this Declaration.

21 I declare under penalty of perjury pursuant to the laws of the United States of
22 America that the foregoing is true and correct.

23 Executed this 19th day of January, 2021, in Santa Rosa, California.

24
25
26 Dated: January 19, 2021

By: /s/ Sara Jacobson
Sara Jacobson
Claimant and Movant